

# Seatours ehf.

## Privacy Policy – Transportation

Seatours (hereinafter referred to as "Seatours") is committed to maintaining the accuracy, confidentiality and security of your personal data. This privacy policy describes Seatours's processing of your personal data, what personal data we collect and how we use the data.

This privacy policy applies to all our customer's personal. This privacy policy also refers to customers as "**you**", and to the company as "**us**".

### 1. Purpose and compliance with law

Seatours is committed to comply with applicable data protection legislation at all times. This privacy policy is based on the Icelandic Act no. 90/2018 on the protection of privacy as regards the processing of personal data, ("**Data Protection Legislation**"), as amended.

### 2. What is personal data?

In this privacy policy, personal data is any information relating to an identified or identifiable individual, i.e. information that can be traced directly or indirectly to a specific individual. Anonymous data and information which does not relate to an identified or identifiable individual is not considered personal data.

### 3. Personal data collected and processed by Seatours

We may collect your personal data in relation to our communication and cooperation where applicable. Different data may be collected on different parties and the processing and collection of personal data may depend on the nature of your relationship with us.

Our customers can be individuals and legal persons.

*Customers' representatives:* When our customers are legal persons, we collect the following information on their representatives:

- contact details, including name, phone and e-mail;
- communication history; and
- information on interests.

*Customers:* We may collect the following information on our customers, who are individuals:

- contact details, including name, ID number, address, telephone number and e-mail;
- country of residence;
- travel information; and
- information about car type and license plate number;
- billing information.

Additionally, we may collect and process other information which you provide to us, as well as information necessary for the company's business.

As a general rule, we collect personal data directly from you. Where personal data is collected from third parties, we will endeavor to notify you.

#### **4. Why do we collect the personal data and on what grounds?**

The personal data we collect about you are primarily processed for the performance of a **contract** or to **take steps prior to entering into a contract** with you or the company you represent. This applies for example to travel information, billing information, contact details so that we can contact you and send you invoices.

If you fail to provide the necessary information we may not be able to enter into a contract with you, or with the company you represent regarding the service you wish us to provide and/or we may be unable to fulfill our obligations according to our contract.

We may process your personal data on the ground of **our legitimate interests**, e.g. communication history as well as information on your interests which we may use to strengthen our business relationship. We may also process your e-mail address to send you customer surveys and where applicable, direct marketing.

Where the collection and processing of personal data is based on your consent, you have the right to withdraw it at any time. All communications in relation to a withdrawal or changes of consent shall be directed to [privacy@eimskip.com](mailto:privacy@eimskip.com).

Seatours undertakes to ensure that all processing of personal data is lawful, fair and transparent. Data will only be collected for a specific, explicit and legitimate purpose and collecting and processing will not go beyond what is necessary for the purpose of the processing. The processing shall always be adequate, relevant and limited to what is necessary for the purpose for which they are processed.

#### **5. Disclosure to third parties**

Seatours may disclose your personal data to contractors and other third parties in relation to their work for the company. Therefore personal data may for example be disclosed to external parties which provide us with IT services.

These third party service providers may be located outside of Iceland. Seatours will not transfer personal data outside the European Economic Area unless such transfer is permitted under applicable data protection legislation. Seatours endeavours to inform you about any disclosure of personal data to countries outside the European Economic Area.

Finally, your personal data may be disclosed to the extent permitted or required by applicable legislation or regulations, e.g. to customs authorities, or to respond to legal actions such as search of premises, subpoenas or court rulings. Disclosure may also be necessary in emergency situations to ensure the safety of the employees of Seatours or third parties.

#### **6. How do we protect and safeguard your personal data?**

Seatours endeavours to take appropriate technical and organisational measures to protect your personal data, with special regard to the nature of the data. For example, Seatours has access controls to systems which store data about you. These measures are implemented to secure personal data against accidental destruction or alteration and against unauthorized access, duplication, use or disclosure.

#### **7. Data retention**

Seatours endeavors to retain your personal data only for as long as necessary in relation to the purpose for which they are processed, unless otherwise permitted or obligated by law.

#### **8. Your rights regarding your personal data**

You have the right to access and, in certain circumstances, to get a copy of the personal data undergoing processing, as well as information about the processing.

In certain instances you may also have the right to have your personal data erased, or to have us restrict the processing. You also have the right to have your personal data rectified, if the data are wrong or inaccurate. It is therefore important that you keep us informed of changes of your personal data, as applicable.

You may also have the right to receive your personal data, which you have provided to us in a machine-readable format or the right to have us transmit those data directly to a third party.

When processing is based on our legitimate interests you can always object to the processing.

Your rights are however not absolute. Laws or regulations may authorise or oblige us to reject your request of exercising your rights. However, your right to object the processing of your personal data for direct marketing purposes is unconditional.

## **9. Inquiries and complaints to the data protection authority**

If you wish to exercise your rights described in section 8 or if you have any questions about this privacy policy or how we process your personal data, please contact us by sending an e-mail to [privacy@eimskip.com](mailto:privacy@eimskip.com) and we will seek to answer any inquiries you may have and instruct you on your rights according to this privacy policy.

If you are unsatisfied with our processing of your personal data you are entitled to make a written submission to the Icelandic Data Protection Authority ([www.personuvernd.is](http://www.personuvernd.is)).

## **10. Contact information**

Seatours's data protection team supervises compliance with this privacy policy. The team's contact information:

Seatours's data protection team: [privacy@eimskip.com](mailto:privacy@eimskip.com)

Seatours's contact information:

Seatours  
Smiðjustíg 3  
340 Stykkishólmur

## **11. Revisions to this privacy policy**

Seatours may make changes to this privacy policy to reflect changes to our legal or regulatory obligations or how we process personal data. A revised version of this privacy policy will be made available on Seatours's website.

Any changes to this privacy policy will be effective from the time the revised version has been published.

This privacy policy was published on July 12<sup>th</sup>, 2018.